

**Devon Zastrow Newman**, OSB #014627  
Email: dnewman@schwabe.com  
**Catherine B. Brinkman**, OSB #002134  
Email: cbrinkman@schwabe.com  
SCHWABE, WILLIAMSON & WYATT, P.C.  
1211 SW 5th Ave., Suite 1900  
Portland, OR 97204  
Telephone: 503-222-9981  
Facsimile: 503-796-2900

**Paul N. Tauger**, *appearing pro hac vice*  
Email: pnt@eclipsegrp.com  
**Anna M. Vradenburgh**, *appearing pro hac vice*  
Email: amv@eclipsegrp.com  
THE ECLIPSE GROUP LLP  
2020 Main Street, Suite 600  
Irvine, CA 92614  
Telephone: 949-851-5000 ext. 110  
Facsimile: 949-851-5051

Attorneys for Defendant Tenza Trading Ltd.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

**CALISTA ENTERPRISES LTD**, a  
Republic of Seychelles Company,

Plaintiff,

vs.

**TENZA TRADING LTD.**, a Cyprus  
Company,

Defendant.

No. 3:13-cv-01045-SI

JOINT STIPULATED MOTION TO EXTEND  
DISPOSITIVE MOTION  
DEADLINES/HEARING

PURSUANT TO LR 16-3

Tenza Trading Ltd. (hereafter “Tenza”) and Calista Enterprises, Ltd. (hereafter “Calista”) submit the following stipulated motion.

### **Local Rule 7.1 Certification**

The undersigned counsel certify that the motion at issue is stipulated by counsel.

### **Motion**

The parties request an extension of two weeks for each of the current dispositive motion deadlines and the hearing on dispositive motions. The current deadlines and proposed extensions are as follows:

<b>PRESENT DEADLINE</b>	<b>PROPOSED DEADLINE</b>
Dispositive Motions Due – 6/2/2014	June 16, 2014
Responses to Dispositive Motions Due – 6/23/2014	July 7, 2014
Replies re Dispositive Motions due – 7/7/2014	July 21, 2014
Dispositive Motion Hearing – 7/11/2014	2 weeks at convenience of the Court

Discovery in this matter required that six expert witness depositions be conducted in six separate locations around the country. Scheduling conflicts of the designated experts required extending the expert witness discovery cut-off by one additional day. On Thursday, May 15, 2014, this Court ordered that the suspended deposition of Tenza expert, Scott Rabinowitz, be resumed. Agreement between counsel of the respective parties resulted in continuation of the deposition of Calista expert, Marc Randazza, whose deposition had also been suspended. The resumed depositions of Mr. Rabinowitz and Mr. Randazza will take place by mutual stipulation in Las Vegas, Nevada, on May 29, 2014 and May 30, 2014, respectively.

The dispositive motion cut-off for this matter is currently set for June 2, 2014. Because of the need for the deposition testimony of these two witnesses, as well as the interruption to preparation time available for the parties’ dispositive motions, the parties have stipulated, and

hereby respectfully request, that the dispositive motion cut-off, as well as subsequent calendared dates for oppositions and reply brief, be continued two weeks so that the new dispositive motion cut-off date shall be June 16, 2014.

In addition, the parties request that the hearing on said dispositive motions, currently scheduled for July 11, 2014, also be moved out at least two weeks to a date convenient to the court, to accommodate the modified briefing schedule and the scheduling needs of counsel.

Consistent with LR 16-3, this motion is made in good faith and not for purposes of delay. The requested extension will not require any modifications to any other case management dates that have been set by the Court.

Dated this 23<sup>rd</sup> day of May, 2014.

Respectfully submitted,

s/ Devon Zastrow Newman

Paul N. Tauger, *appearing pro hac vice*  
Anna M. Vradenburgh, *appearing pro hac vice*  
THE ECLIPSE GROUP LLP  
Telephone: 949-851-5000 ext. 110  
Facsimile: 949-851-5051

Devon Zastrow Newman, OSB #014627  
Catherine B. Brinkman, OSB #002134  
SCHWABE, WILLIAMSON & WYATT, P.C.  
Telephone: 503-222-9981  
Facsimile: 503-796-2900

Attorneys for Defendant Tenza Trading Ltd.

s/ Evan Fray-Witzer

Evan Fray-Witzer, *appearing pro hac vice*  
Matthew Shayefar, *appearing pro hac vice*  
Valentin David Gurvits, *appearing pro hac vice*  
BOSTON LAW GROUP, PC  
Telephone: 617-928-1806  
Facsimile: 617-928-1802

Sean Ploen, *appearing pro hac vice*  
PLOEN LAW FIRM, PC  
Telephone: 651-894-6800  
Facsimile: 651-894-6801

Thomas Freedman, Jr., OSB #080697  
PEARL LAW LLC  
Telephone: 503-295-6296

Attorneys for Plaintiff Calista Enterprises Ltd.